

JOSEPH P. RUSSONIELLO (CASBN 44332)
United States Attorney

BRIAN J. STRETCH (CASBN 163973)
Chief, Criminal Division

JEFFREY D. NEDROW (CASBN 161299)
Assistant United States Attorneys

150 Almaden Boulevard, Suite 900
San Jose, California 95113
Telephone: (408) 535-5045
Fax: (408) 535-5066
Email: jeff.nedrow@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No.: CR 09-00597-JF
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER FOR CONTINUANCE OF
v.)	SENTENCING HEARING
)	
YONG P. SHINN,)	
)	
Defendant.)	

The United States, through its counsel Jeffrey Nedrow, and defendant Yong P. Shinn, through his counsel Miles Ehrlich, hereby agree and stipulate to a continuance of the sentencing hearing in this case scheduled for April 7, 2010 to June 23, 2010 at 9:00 a.m.

The parties agree that the following reasons exist for this continuance:

The government and the defense are continuing to provide information to the Probation Office in connection with this matter. Both parties believe this information will assist the Probation Office in connection with the preparation of the Presentence Report. Additional time is needed for the Probation Officer to receive this information and prepare the Presentence Report. Accordingly, a continuance is necessary to provide the Court with a full picture of the offense conduct at sentencing. The Probation Officer has been informed of this requested

//

STIPULATION RE: CONTINUANCE
CR 09-00597-JF

1 continuance.

2 Respectfully submitted,

3
4 March 30, 2010

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
_____/s/
MILES EHRLICH
Counsel for Christine Shinn

March 30, 2010

_____/s/
JEFFREY D. NEDROW
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No.: CR 09-00597-JF
)	
Plaintiff,)	ORDER CONTINUING
)	<u>SENTENCING HEARING</u>
v.)	
)	
YONG P. SHINN,)	
)	
Defendant.)	

Based on the stipulation of the parties and the facts set forth in the stipulation between the parties, and good cause appearing,

IT IS HEREBY ORDERED that the sentencing hearing in this case is continued from
April 7, 2010 to June ²⁴~~23~~, 2010 at 9:00 a.m.

DATED: 3/31/10


JEREMY FOGEL
United States District Judge